

## UNITED STATES DISTRICT COURT

EASTERN

DISTRICT OF

TEXAS

NICOLE HINSON, ET AL.

**EXHIBIT AND WITNESS LIST**

V.

DOREL JUVENILE GROUP, INC.

Case Number: 2:15-CV-713

PRESIDING JUDGE ROY S. PAYNE					PLAINTIFF'S ATTORNEY JEFFREY T. EMBRY	DEFENDANT'S ATTORNEY JONATHAN JUDGE
TRIAL DATE (S) 6/13/16					COURT REPORTER	COURTROOM DEPUTY BECKY ANDREWS
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
	1				Texas Peace Officer's Crash Report*	
	2				TDPS Scene Photographs	
	3				Hawkins Fire Department Scene Photographs	
	4				Subject Vehicle Photographs (May 17, 2013)	
	5				Subject Vehicle Photographs (May 23, 2013)	
	6				Subject Vehicle Photographs (February 28, 2014)	
	7				Chevrolet Suburban Photographs (May 17, 2013)	
	8				GEICO Chevrolet Suburban Photographs (May 22, 2013)	
	9				Other Chevrolet Suburban photographs (May 23, 2013 and undated)	
	10				Champion EMS Run Reports	
	11				Bosch Subject Vehicle CDR Download (Feb 28, 2014)	
	12				Josh Boyd Declaration	
	13				Records from Wyatt's Towing	
	14				Insurance records from GEICO	
	15				Insurance records from Farmer's Insurance Exchange	
	16				Records from Baylor Health Care System*	
	17				Records from Children's Medical Center*	
	18				Records from Good Shepherd Medical Center*	
	19				Records from Mother Francis Hospital*	
	20				Records from Our Children's House at Baylor*	
	21				Records from Wellness Pointe*	
	22				Records from Creative Motion Pediatric Therapy*	

\* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	23				Records from East Texas Children's Therapy*
	24				Records from Tyler Radiology Associates*
	25				Records from Premier Specialists*
	26				Records from NuMotion*
	27				Records from Walgreen's Pharmacy*
	28				Summit Design Drawings
	29				Sales Data
	30				Hazard Analysis
	31				QA Loop
	32				DJG Instruction Manual for subject Summit child restraint
	33				DJG labels for subject Summit child restraint
	34a				DJG Internal Test Reports
	34b				DJG Internal Test Videos
	35				Consumer Accident Reports with Summit child restraints* (selected)
	36				DJG PowerPoint*
	37				DJG Testing Facilities Video*
	38				DJG 2011 website advice info
	39				FMVSS 213 (2012), 49 CFR § 571.213
	40				Forward to FMVSS 213 Quick Reference Guide
	41				NHTSA Misuse of Child Restraints — January 2004
	42				NHTSA Child Safety Seat Test Results — 2012
	43				NHTSA Traffic Safety Facts – 2012 (DOT 812 032)
	44				David J. Altman Notice of Deposition*
	45				David J. Altman, M.D.'s March 8, 2016 report*
	46				David J. Altman, M.D.'s February 2, 2016 report*
	47				David J. Altman, M.D.'s December 31, 2014 report*
	48				David J. Altman, M.D.'s October 13, 2014 report*

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	49				Dr. Altman's file folder*
	50				Discharge Summary for C.H.*
	51				Creative Motion Pediatric Therapy OT Progress Notes for C.H.*
	52				Creative Motion Pediatric Therapy Physical Therapy Evaluation for C.H.*
	53				Institute for Healthy Living, Good Shepherd Medical Center Initial Evaluation/Examination for C.H.*
	54				Children's Health Medical Record for C.H.*
	55				ICD-10 Code Lookup and ICD-9 Code Lookup*
	56				Mother Frances Hospital CT record for C.H.*
	57				Baylor, Our Children's House at Baylor, Pediatric Hospitalist Note, 5/26/2013*
	58				Children's Medical Center, Physical Medicine and Rehabilitation Consultation Note for C.H.*
	59				Gary Whitman Notice of Deposition*
	60				Analysis Report*
	61				Growth Chart for Boys and Girls*
	62				Deposition Summary*
	63				Whitman Photographs*
	64				Whitman Photographs*
	65				Whitman Photographs*
	66				Rule 26b Listing*
	67				5/8/15 Note*
	68				Surrogate Analysis*
	69				Deposition & Trial List*
	70				Gary Whitman Resume*
	71				ARCCA Case Review*
	72				Growth Chart*
	73				Australian Literature*
	74				Car Safety Seats Product listing for 2012*
	75				Mr. Whitman's Invoice*

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	76				Life Care Plan for C.H. Backup Book February 19, 2016 Centrality Model*
	77				Quality of Life and Adaptation for Traumatic Brain Injury Survivors: Assessment of the Disability C
	78				Report of Neuropsychological Evaluation 01/05/16 and 01/06/16*
	79				Life Care Plan for C.H. - 12/16/2014*
	80				Donna Britton Deposition notice*
	81				Car seat handouts*
	82				C.H.'s medical records*
	83				Additional medical records for C.H.*
	84				Medical Report*
	85				Interrogatories*
	86				Summit Instruction Booklet*
	87				3/21/11 E-mail Chain*
	88				Phase I Exit-Initiation Phase*
	89				Cosco Project Brief*
	90				Dorel Documents*
	91				Michelle Hoffman Notice of Depositions*
	92				Letter with attachments to Jeff Embry from Michelle R. Hoffman, January 2, 2015*
	93				Letter to Jeff Embry from Michelle R. Hoffman, January 7, 2016*
	94				Letter with attachments to Jeff Embry from Michelle R. Hoffman, February 4, 2016*
	95				Handwritten notes of Michelle Hoffman*
	96				Illustration of different regions of the spine*
	97				Diagram of small child*
	98				Document entitled, "Lateral region of abdominal region/definition of lateral region of abdominal regi
	99				Diagram depicting variety of brain images*
	100				Patient file*
	101				Trinity Mother Frances medical record*
	102				Medical records*

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	103				Our Children's House at Baylor pediatric hospitalist note, dated May 26, 2013*
	104				Champion EMS medical records*
	105				"Trauma Scoring"
	106				Handwritten options*
	107				Tammy Robertson medical record*
	108				Dr. Joyce's report*
	109				Draft of Dr. Joyce's report*
	110				Rule 30, Federal Rules Procedure*
	111				Dorel FAQs*
	112				Notice of 30(b)(6) deposition*
	113				Selection from Dorel website*
	114				June 30, 2009 e-mail chain*
	115				Hazard analysis*
	116				February 2010 Emerson e-mail*
	117				Merchandising meeting PowerPoint*
	118				March 21, 2011 e-mail exchange*
	119				March 22, 2011 e-mail exchange*
	120				April 2011 Pylotis e-mail*
	121				Selection, Safety 1st/Dorel website*
	122				November 2011 e-mail exchange*
	123				December 2011 webinar e-mail*
	124				AAP Policy Statement*
	125				Two electronic video files*
	126				Wyatt's Towing Letter*
	127				Defendant's Notice of Oral and Videotaped Deposition of James Ross and Subpoena Duces Tecum
	128				Training Plan Acknowledgement Cashier*
	129				Training Plan Acknowledgement Dept. 10 Salesfloor Associate*

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	130				TPMS and Tire Disclaimer*
	131				Trainer Plan Acknowledgement, Greeter - TLE*
	132				Training Plan Acknowledgement, Department 37 Service Technician*
	133				Technician Certification Chart*
	134				My Training Plan, TLE Service Supervisor*
	135				TPMS and Tire Disclaimer*
	136				My Training Plan, TLE Service Supervisor*
	137				Service record from Walmart in Mineola*
	138				Page printed from Walmart's website*
	139				Defendant's Notice of Oral and Videotaped Deposition of Jennifer Plunkett*
	140				Records from Mother Frances Hospital of C.H.*
	141				Tommy Barrett Subpoena*
	142				Texas Peace Officer's Crash Report*
	143				Thirty (30) Color Photographs*
	144				Document entitled "Replacing two tires? Put them on the rear."*
	145				Discount Tire Direct, Info Center - Speed Rating*
	146				EMS Records for C.H.*
	147				EMS Records for Nicole Hinson*
	148				Defendant's Notice of Oral and Videotaped Deposition of Dr. Mark Anderson and Subpoena Duces
	149				Records from Mother Frances Hospital of C.H.*
	150				Patient Care Report of Cameron Hinson*
	151				Five (5) Photographs*
	152				Trainer Plan Acknowledgement, Greeter - TLE*
	153				Technician Certification Chart*
	154				TPMS and Tire Disclaimer*
	155				Service Order*
	156				Drawing*




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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	157				Service Order*
	158				TPMS and Tire Disclaimer*
	159				My Training Plan, TLE Service Technician*
	160				Technician Certification Chart*
	161				Wal-Mart Service Order (Tilley vehicle)*
	162				Article: Two New Tires Should be Mounted on the Rear*
	163				American Academy of Pediatrics "Car Safety Seats: A Guide for Families 2012"
	164				CDC Growth Chart*
	165				CIREN Case Study Summary*
	166				Greg Stephens C.V.*
	167				Mr. Stephens' scene inspection photos*
	168				Mr. Stephens' photogrammetry materials*
	169				Mr. Stephens' cited literature / secondary sources*
	170				
	171				Mr. Stephens' illustrations and demonstratives for trial, to be exchanged between counsel before the trial
	172				William Van Arsdell C.V.*
	173				Dr. Van Arsdell inspection photographs*
	173a				Photographs of C.H. Summit shoulder belt bar*
	173b				Photographs of Tested Summit shoulder belt bar*
	173c				Photographs of C.H. Summit*
	173d				Photographs of CAPE-Tested Summits*
	173e				Photographs of Dorel-Tested Summits*
	173f				Surrogate Study Photographs*
	174				Dr. Van Arsdell's cited literature / secondary sources*
	175				
	176				Dr. Van Arsdell's illustrations and demonstratives for trial, to be exchanged between counsel before the trial
	177				FMVSS 213 Testing Summary, Forward-Versus-Rear-Facing*

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	178				Lisa Gwin C.V.*
	179				Dr. Gwin's file materials*
	179a				Dr. Gwin's inspection photos*
	179b				Dr. Gwin's surrogate study photos*
	180				Dr. Gwin's cited literature / secondary sources*
	181				Dr. Gwin's illustrations and demonstratives for trial, to be exchanged between counsel before the 
	182				Walter Harrell C.V.*
	183				
	184				Dr. Harrell's cited literature / secondary sources*
	185				Dr. Harrell's illustrations and demonstratives for trial, to be exchanged between counsel before the 
	186				Juan Latorre C.V.*
	187				
	188				Dr. Latorre's cited literature / secondary sources*
	189				Dr. Latorre's illustrations and demonstratives for trial, to be exchanged between counsel before the 
	190				CAPE / Exponent testing report*
	191				CAPE / Exponent testing videos*
	191a				Kinematic freeze frames from videos*
	192				CAPE / Exponent testing notations and data*
	193				Michael Prange C.V.*
	194				Previously-disclosed Learned Treatises as needed (demonstrative only)*
	195				Jeya Padmanaban C.V.*
	196				Jeya Padmanaban file materials*
	196a				Jeya Padmanaban underlying data*
	196b				Henry et al, "Car safety seats for children: rear facing for best protection"
	196c				AAP: 2011 Car Seat Guidelines*
	196d				AAP: 2011 Car Seat Technical Report*
	196e				"Report to Congress, NHTSA's Crash Data Collection Programs," DOT HS 811 337, April 2010*



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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	197				Reports and file materials of Gary Whitman (excerpts as needed)*
	198				Reports and file materials of Michelle Hoffman (excerpts as needed)*
	199				Reports and file materials of any expert called by plaintiffs, as needed for cross-examination*
	200				C.H.'s Summit child seat (to be produced by Plaintiffs)*
	201				An exemplar Summit child seat (or photographs thereof)*
	202				CAPE Test 1 Summit child seat*
	203				CAPE Test 2 Summit child seat*
	204				CAPE Test 3 Summit child seat*
	205				Dorel FMVSS Test 1 Summit child seat*
	206				Dorel FMVSS Test 2 Summit child seat*
	207				An exemplar Evenflo seat (or photographs thereof)*
	208				An exemplar Graco combination seat (or photographs thereof)*
	209				An exemplar Recaro Passport seat (or photographs thereof)*
	210				An exemplar Kids Embrace seat (or photographs thereof)*
	211				The subject Chevrolet Silverado truck (to be produced by Plaintiffs)
	212				Demonstratives of counsel and experts*
	213				Plaintiffs' Pleadings, Discovery responses, Expert Reports, Exhibits and Settlement agreements 
	214				Plaintiffs' Pleadings, Discovery responses, Expert Reports, Exhibits and Settlement agreements 
	215				Photos / Videos of C.H.* (only as needed)
	216				Materials as needed for impeachment / rebuttal, including experts' previously produced file materials 
					* indicates "may" use
					Note: Defendant is not vouching for the reliability or credibility of Plaintiffs' experts' opinions or the 

**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing to be filed with the Clerk of Court using the CM/ECF System on June 7, 2016, which will automatically send e-mail notification of such filing and a link to a copy of the document to all attorneys of record.

/s/ Matthew G. Schiltz

Matthew G. Schiltz